

WIGDOR LLP

ATTORNEYS AND COUNSELORS AT LAW

85 FIFTH AVENUE
NEW YORK, NY 10003
TEL 212.257.6800
FAX 212.257.6845
WWW.WIGDORLAW.COM

Lindsay M. Goldbrum
lgoldbrum@wigdorlaw.com

November 23, 2021

VIA ECF

The Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

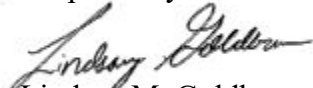
Re: Hatzimihalis v. SMBC Nikko Securities America, Inc., *et al.*;
No. 20-cv-8037 (JPC)

Dear Judge Cronan:

We represent Plaintiff Haido Irene Hatzimihalis (“Plaintiff”) and write further to the Court’s November 22, 2021 (the “Order”) (Dkt. No. 39).

On November 22, 2021, the Court directed non-party Genting Americas, Inc. (“Genting”) to show cause why it should not be compelled to comply with a subpoena issued pursuant to Rule 45. Newly-retained counsel for Genting, Cleary Gottlieb Steen & Hamilton LLP, and counsel for Plaintiff have since met and conferred. To that end, Plaintiff has provided Genting with proposed parameters for a search of its electronic databases. As such, we respectfully request that the Court temporarily stay Genting’s December 3, 2021 response to give the parties to this dispute an opportunity to resolve the issue without judicial intervention.

Respectfully submitted,


Lindsay M. Goldbrum

cc: All Counsel of Record (*via* ECF)

Plaintiff shall file a status letter informing the Court when the third-party subpoena dispute is resolved, or by December 17, 2021 if a resolution has not been achieved by that date.

SO ORDERED.
Date: November 29, 2021
New York, New York


JOHN P. CRONAN
United States District Judge